

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOHN SHAFFER and	:	Civil Action
JENNIFER SHAFFER, h/w	:	
110 Parkhurst Street	:	
Elkland, PA 16920	:	
	:	Case No. _____
v.	:	
	:	
FADI BADER SWEISS, MD	:	
740 High Street, Floor 3	:	Jury Trial Demanded
Williamsport, PA 17701	:	
	:	
KELLY L. FARRELL, PA-C	:	Electronically filed
740 High Street, Floor 3	:	
Williamsport, PA 17701	:	
	:	
SUSQUEHANNA PHYSICIAN	:	
SERVICES d/b/a The Neuroscience	:	
Center	:	
1201 Grampian Boulevard	:	
Williamsport, PA 17701	:	
	:	
BRITTANY T. GRUBB, RN	:	
700 High Street	:	
Williamsport, PA 17701	:	
	:	
UPMC WILLIAMSPORT	:	
700 High Street	:	
Williamsport, PA 17701	:	
	:	
UNITED STATES OF AMERICA	:	
c/o United States Attorney for the	:	
Middle District of Pennsylvania	:	
240 W. 3 rd Street	:	
Williamsport, PA 17701-6465	:	
	:	

Certificate of Merit as to Brittany T. Grubb, RN

I, Dennis M. Abrams, certify that:

- X an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

- the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this defendant is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

- expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

LOWENTHAL & ABRAMS, PC

BY: /s/ Dennis M. Abrams
DENNIS M. ABRAMS, ESQUIRE